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December 1, 2020

BY ECF ONLY W/OUT COURTESY COPY

Hon. Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: Deborah Ann Gattoni v. Mount Sinai Health System, Inc., et al.
Civil Action No. 1:20-cv-2947

Dear Judge Vyskocil:

We represent defendants Mount Sinai Health System, Inc., Mount Sinai Beth Israel Medical Center a/k/a Beth Israel Medical Center, and Beth Israel Medical Center (collectively the "Mount Sinai Defendants") in connection with the above-referenced matter. We write on behalf of all parties to respectfully request a forty-five (45) day extension, from December 3, 2020 to January 18, 2021, of the parties' time to submit a joint Proposed Case Management Plan and Scheduling Order and joint letter (as required by the Court's Individual Rules of Practice), and a concomitant adjournment, *sine die*, of the Initial Pre-trial Conference currently scheduled for December 15, 2020 at 11:30 am. These requests are made so that the parties can continue to discuss resolving this matter amicably, without the need for further litigation, and can move towards finalizing and consummating a settlement – which the parties are hopeful they can do within the next forty-five (45) days, if not sooner.

Accordingly, for these good reasons, the parties jointly request that their time to submit the Proposed Case Management Plan and Scheduling Order and joint letter be extended to January 18, 2021, and that the Initial Pre-Trial Conference be adjourned *sine die*. In the unlikely even that the parties are unable to resolve this matter by January 18, 2021, the parties will so advise the Court and will proceed with filing a Proposed Case Management Plan and Scheduling Order and joint letter by that date. This is the parties first request for such relief.

We thank the Court for its time and attention regarding these matters.

Very truly yours,

By: /s/ Scott R. Landau

Scott R. Landau
Attorney for the Mount Sinai Defendants

cc: Robert J. Cristiano, Esq. (via ECF only)

The Initial Pretrial Conference scheduled for December 15, 2020, at 11:30 AM is adjourned to February 2, 2021, at 11:00 AM. The parties shall file their joint letter and Proposed Case Management Plan and Scheduling Order on or before January 25, 2021.

SO ORDERED.

Date: 12/1/2020
New York, New York


Mary Kay Vyskocil
United States District Judge

Exhibit A